

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

FOUR TIMES SQUARE
NEW YORK 10036-6522

TEL: (212) 735-3000
FAX: (212) 735-2000
www.skadden.com

DIRECT DIAL
(212) 735-2628
DIRECT FAX
(917) 777-2628
EMAIL ADDRESS
JAY.KASNER@SKADDEN.COM

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June 18, 2014

VIA ECF

Honorable Paul G. Gardephe
United States District Judge
United States District Court
for the Southern District of New York
500 Pearl Street
New York, New York 10007

RE: Wilder v. News Corp., 11 CV 4947 (PGG)

Dear Judge Gardephe:

We represent defendants News Corporation (now known as 21st Century Fox), K. Rupert Murdoch, James Murdoch and NI Group Limited in the above-referenced putative securities class action. We write on behalf of all defendants¹ to respectfully request that the Court enter the briefing schedule described below for defendants' anticipated motions to dismiss the Consolidated Second Amended Class Action Complaint (Docket No. 71) ("Second Amended Complaint").

In their June 16 letter, Docket No. 81 at 1, Plaintiffs "agree that defendants should be permitted to file a Rule 12 Motion," but propose that defendants' anticipated motions be limited to a "single consolidated supplemental brief of no more than 35 pages" addressing only the Second Amended Complaint's amendments to the original Complaint and "incorporating by reference those portions of their prior Rule 12 briefs that remain applicable to the Second Complaint."

We respectfully submit that a single consolidated brief incorporating multiple prior briefs by reference will be cumbersome for the Court and will prohibit Defendants from fully responding to the allegations in the Second Amended Complaint. As with the previous round of briefing, Defendants believe it would be more efficient to file separate opening and reply briefs in support of their respective motions to dismiss

¹ Defendants Rebekah Brooks and Les Hinton are represented by separate counsel.

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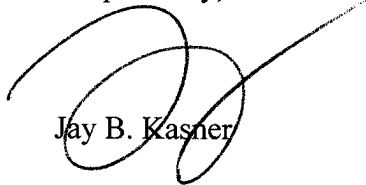
addressing all of the deficiencies in the Second Amended Complaint germane to each defendant. Defendants will coordinate to avoid duplication.

Defendants propose the following briefing schedule, which provides approximately forty-five days for opening briefs and opposition as well as thirty days for Defendants' reply briefs:

- Monday, August 4, 2014: Defendants' opening briefs in support of their respective motions to dismiss the Second Amended Complaint;
- Friday, September 19, 2014: Plaintiffs' opposition briefs;
- Monday, October 20, 2014: Defendants' reply briefs.

We remain available to confer at the Court's convenience.

Respectfully,

A handwritten signature in black ink, consisting of a large, stylized 'J' and 'K' that are interconnected, followed by a horizontal line extending to the right.

Jay B. Kasner

cc: All counsel (via ECF)